



Order Filed on October 24, 2024  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with  
D.N.J.LBR 9004-1**

**STEWART LEGAL GROUP, P.L.**

*Formed in the State of Florida*

Gavin N. Stewart, Esq.

*Of Counsel to Bonial & Associates, P.C.*

401 East Jackson Street, Suite 2340

Tampa, FL 33602

Tel: 813-371-1231/Fax: 813-371-1232

E-mail: gavin@stewartlegalgroup.com

*Attorney for Global Lending Services LLC*

In re:

Mirtha D. Perez

*aka Mirtha C Perez*

*aka Mirtha De la Caridad Perez*

*aka Mirtha Perez*

Debtor.

Chapter: 13

Case No.: 23-16132-JKS

Hearing Date: October 10, 2024

Judge John K. Sherwood

**CONSENT ORDER RESOLVING MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

The relief set forth on the following pages is hereby **ORDERED**.

**DATED: October 24, 2024**

A handwritten signature in black ink, appearing to read "J K Sherwood", written over a horizontal line.

Honorable John K. Sherwood  
United States Bankruptcy Court

Debtor: Mirtha D. Perez  
Case No.: 23-16132-JKS  
Caption of Order: **CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY**

THIS MATTER having been opened to the Court upon the Motion for Relief from the Automatic Stay (“Motion”) filed by Global Lending Services LLC (“Creditor”), and whereas the underlying is current as of September 24, 2024, and whereas the Debtor and Creditor seek to resolve the Motion, it is hereby **ORDERED**:

1. The automatic stay provided under 11 U.S.C. §362(a) shall remain in effect as to Movant’s interest in the following property: **2019 Lexus NX; VIN: JTJBARBZ1K2196251** provided that the Debtor complies with the following:

a. The Debtor shall resume making the regular contractual monthly payments directly to the Creditor as each becomes due, **beginning with the October 8, 2024 payment** and continuing thereon per the terms of the underlying Contract.

2. All payments due hereunder shall be sent directly to Creditor at the following address: **Global Lending Services, LLC, 1200 Brookfield Boulevard, Suite 300, Greenville, SC 29603.**

3. The Debtor will be in default under the Consent Order if the Debtors fail to comply with the payment terms and conditions set forth in above paragraphs and/or if the Debtors fail to make any payment due to Creditor under the Chapter 13 Plan.

4. If the Debtors fail to cure the default within thirty (30) days from the date of default, Creditor may submit a Certificate of Default to the Court on fourteen (14) days’ notice to counsel for Debtors and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. § 362(a), and permitting Creditor to exercise any rights under the loan documents with respect to the above vehicle.

5. Creditor is awarded reimbursement of attorney fees and costs in the amount of \$250.00 and \$199.00, respectively to be paid through the Chapter 13 Plan.

**STIPULATED AND AGREED:**

/s/ Jamal J. Romero

Jamal J. Romero, Esq.  
Scura, Wigfield, Heyer & Stevens  
1599 Hamburg Turnpike  
Wayne, NJ 07470  
*Counsel for Debtor*

/s/ Gavin N. Stewart

Gavin N. Stewart, Esq.  
Stewart Legal Group, P.L.  
401 East Jackson Street, Suite 2340  
Tampa, FL 33602  
*Counsel for Creditor*

In re:  
Mirtha D. Perez  
Debtor

Case No. 23-16132-JKS  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-2  
Date Rcvd: Oct 24, 2024

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 26, 2024:

Recip ID	Recipient Name and Address
db	+ Mirtha D. Perez, 21 Terrace Place, Kearny, NJ 07032-1621

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 26, 2024

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 24, 2024 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Federal Home Loan Mortgage Corporation as Trustee for the benefit of the Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2019-2 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Gavin Stewart	on behalf of Creditor Global Lending Services LLC bk@stewartlegalgroup.com
Jamal J Romero	on behalf of Debtor Mirtha D. Perez jromero@scura.com dstevens@scura.com;ecfbkfilings@scuramealey.com;vmajano@scura.com;spereyra@scura.com;14799@notices.nextchapterbk.com;dwoody@scura.com;pevangelista@scura.com;amurphy@scura.com
Kimberly A. Wilson	on behalf of Creditor Federal Home Loan Mortgage Corporation as Trustee for the benefit of the Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2019-2 kimwilson@raslg.com
Marie-Ann Greenberg	

District/off: 0312-2

User: admin

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Date Rcvd: Oct 24, 2024

Form ID: pdf903

Total Noticed: 1

magecf@magtrustee.com

Robert P. Saltzman

on behalf of Creditor Discover Bank dnj@pbslaw.org

Stuart H. West

on behalf of Creditor Discover Bank swest@pbslaw.org

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 8